

ANTONIO TREY JONES, by and  
through his Guardian Ad Litem,  
CHARLES M. BRITTAIN, III

Plaintiff,

V.

JAMES THORNTON, *et al.*,

Defendants.

NOW COMES the N. C. State Bureau of Investigation (“SBI”) through counsel, Special Deputy Attorney General J. Locke Milholland, IV, pursuant to Fed. R. Civ. P. 26(c)(1), requesting that the Court enter a Consent Protective Order controlling the production of confidential documents, material and information (“Confidential Information”). A copy of the proposed Consent Protective Order is attached hereto. In support of this motion, SBI states as follows:

1. The SBI has located documents that are responsive and may be responsive to future discovery requests propounded by Plaintiff to Defendants.
2. The documents identified and located by the SBI contain confidential information.
3. In light of the confidentiality of this material, and in an effort to protect that confidentiality, a Consent Protective Order is necessary to authorize the release of the Confidential Information and its handling as well as to ensure that the Confidential Information is not disclosed or used for any purpose except in connection with this litigation.

4. In the interests of justice and to further the legitimate causes of this litigation, SBI respectfully requests that the Court enter the attached proposed Consent Protective Order in order to permit the disclosure of the confidential information subject to its terms.
5. Undersigned counsel has conferred with counsel for the Plaintiff and counsel for Defendants, and all counsel of record agree to entry of the Consent Protective Order.

WHEREFORE, the SBI respectfully requests that this Court enter the Consent Protective Order, and grant such and other further relief as the Court deems appropriate.

This the 16<sup>th</sup> day of September 2024.

**JOSHUA H. STEIN**  
**Attorney General**

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## **CERTIFICATE OF SERVICE**

I, J. Locke Milholland, IV, hereby certify that on this day, I electronically filed the foregoing **MOTION FOR ENTRY OF CONSENT PROTECTIVE ORDER** with the Clerk of the Court utilizing the CM/ECF system, which will provide electronic notification to counsel of record as follows:

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The 16th day of September 2024.

/s/ J. Locke Milholland, IV  
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Special Deputy Attorney General